

7/13/2012

U.S. DISTRICT COURT
DISTRICT OF N.H.
FILED
JUL 16 A 11:39
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

K. et al.

Plaintiffs

v.

Civil Action No. 09-cv-94-JL

New Hampshire Department of
Health and Human Services, et al.
Defendants

Motion:

1. To continue the case and not take any action between July 15th and September 5th.
2. To allow us 1 Month after our return to find an attorney.

Now comes Bhavnes Kaushik pro se to respectfully move the honorable court to grant the above motion.

Reasons are as follows:

1. I had 3 heart attacks and a 6 bypass surgery in April 2010. It has been more than 2 years since then and the doctors at DHMC are trying their best to help me get better. I can't see out of my left eye very well, I have memory loss, severe pain, and on top of that I have depression and my depression is growing.
2. My wife SK has chronic pain which the doctors at DHMC cannot fix. She also has severe depression.
3. My youngest Daughter, BK, has severe depression after the bad treatment received from DCYF. We discussed the situation with all of our doctors and they suggested that it will be helpful to go back to India to meet with friends and relatives, and the kids want to learn more about Indian culture and religion so they will feel comfortable.

4. We want to get a second expert opinion on all our illnesses. There are so many good doctors in India and medical treatment is much Cheaper than in the US. We have decided to go to India on July 15th, 2012, and return on September 4th, 2012. Hopefully it will help us in the future with our problems. **Racist** Judge Laplante Is trying to dismiss the case as quickly as possible. Judge Laplante did a big favor to the powerful Attorney General's Office when he allowed attorney Nancy Tierney to withdraw. A point to be noted is that Nancy Tierney originally filed the case. SK is severely depressed and in Severe pain and her knowledge of English is limited. Getting treatment from India was planned months ago and Nancy Tierney knew that. At the last moment when we are ready to leave for India she is withdrawing from the case under pressure from the powerful Attorney General's Office and racist judge Laplante is ready to dismiss the case. I have requested so many times before that we want the case to move out of the State of New Hampshire because I am under depression and cannot represent myself, and now Judge Laplante wants SK to represent herself when she is severely sick and know very little English.

I request the honorable court not to take any action until we come back on September 4th and give us at least 1 Month to find another attorney to represent us.

Sincerely,



Bhavnesh Kaushik
82 South Main Street
West Lebanon NH, 03784

Cc: Nancy Tierney, Attorney General's Office